

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE PEOPLE OF THE STATE OF NEW YORK, by  
BARBARA D. UNDERWOOD, Attorney General of  
the State of New York,

Plaintiff,

v.

HUTTON VENTURES, LLC; PROGRESS  
ADVOCATES, LLC; PROGRESS ADVOCATES  
GROUP, LLC; STUDENT ADVOCATES, LLC;  
STUDENT ADVOCATES GROUP, LLC; STUDENT  
ADVOCATES TEAM, LLC; STUDENT LOAN  
CARE, LLC; STUDENT LOAN SUPPORT LLC;  
EQUITABLE ACCEPTANCE CORPORATION;  
BRUCE BELLMARE; and STANLEY E.  
FREUMUTH,

Defendants.

Civil Action No.: 18-cv-09812-AJN

**NOTICE OF MOTION**

**TO:** Melvin L. Goldberg, Esq.  
Office of the New York State Attorney General  
28 Liberty Street  
New York, NY 10005  
*Attorneys for Plaintiff*

Eric Thomas Krejci, Esq.  
Clausen Miller P.C.  
28 Liberty Street Fl 39  
New York, NY 10005  
*Attorneys for Defendant Progress Advocates, LLC, Student Loan Care, LLC, Bruce Bellmare, Stanley E. Freimuth, and Debt Resolve, Inc.*

Adel James Chareq, Esq.  
Hudson Cook, LLP  
1909 K Street NW  
Washington, DC 20006  
*Attorneys for Defendant Equitable Acceptance Corp.*

**PLEASE TAKE NOTICE** that at a date and time to be determined by the Court, the undersigned, attorneys for Defendants Progress Advocates Group, LLC, Student Advocates Group, LLC, Student Advocates Team, LLC and Student Loan Support, LLC (collectively “Defendants”) will move before the United States District Court for the Southern District of New York, located at 100 State Street, Rochester, New York 14614, before Honorable Alison J. Nathan, United States District Judge, for an Order granting Defendants’ Motion to Dismiss; and

**PLEASE TAKE FURTHER NOTICE** that Defendants shall rely upon the enclosed Brief in Support of the Motion and the Certification of Peter G. Siachos, Esq., with exhibit, in support of the within application.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is submitted with this motion.

Defendants respectfully requests oral argument if opposition is timely filed.

Dated: March 8, 2019  
New York, New York

**GORDON REES SCULLY MANSUKHANI LLP**  
*Attorneys for Defendants*  
*Progress Advocates Group, LLC,*  
*Student Advocates Group, LLC,*  
*Student Advocates Team, LLC, and*  
*Student Loan Support, LLC*

By: /s/ Peter G. Siachos  
Peter G. Siachos, Esq.  
Matthew P. Gallo, Esq.

One Battery Park Plaza, Floor 28  
New York, NY 10004  
Tel: (973) 549-2500  
Fax: (973) 377-1911  
E-mail: [psiachos@grsm.com](mailto:psiachos@grsm.com)  
E-mail: [mgallo@grsm.com](mailto:mgallo@grsm.com)